

Chemigation Compliance Evaluation

Focused Activity Plan

Example

Background

For chemicals registered with application through irrigation systems (chemigation), the U.S. Environmental Protection Agency requires label language that specifies equipment that must be present to protect water sources from contamination due to backflow. Recent incidents involving chemigation have included contamination of ground water and bird kills with follow-up inspections indicating a range of problems from non-compliance with label language to faulty devices. While some counties inspect chemigation sites for compliance if a restricted use pesticide is applied, inspections are generally not conducted for non-restricted use pesticides. Over 100 active ingredients and over 300 separate product labels have been identified with a chemigation label, many of which are non-restricted use pesticides. The goal of this project is to develop a process to identify chemigation sites and then to initiate inspections of a portion of these.

Training

For compliance with chemigation requirements, county staff will attend the chemigation training course provided by the Center for Irrigation Technology. The course is designed to focus on enforcement aspects of the label and will describe and illustrate the key equipment components of a chemigation system.

Chemigation Site Inspections Description

For the 2003 permit season, the county will collect and record information that can be used to identify chemigation site locations for both restricted and non-restricted use pesticides. Department of Pesticide Regulation staff have identified a list of pesticide products that contain at least one label for chemigation application. The use of this list will be evaluated as an aid in identification of permit applications that use chemigation. A portion of identified sites will be inspected and evaluated for their level of compliance. Some concurrent inspections with Enforcement staff will occur.

Chemigation Site Inspections Action Plan

- a. Identify chemigation sites in the county. One possibility is to determine sites through a grower survey conducted at permit application.
- b. On permit maps for each county, record site locations and other pertinent information, such as chemical used, restricted/non-restricted use, crops, application timing.
- c. Inspect five percent of chemigation sites in the county or a minimum of five sites to determine the level of compliance with chemigation equipment requirements.

Project Report

County Agricultural Commissioners will provide a report to the Pest Management and Licensing Branch that documents completion of the action plan for training and chemigation site identification within 60 days of the end of the activity or fiscal year, whichever occurs sooner.